

APPENDIX A5

Monitor Stormwater Pollutant Loads and Loads Reduced (C.11/12.g)

Progress Report

Background

Provisions C.11.g and C.12.g require Permittees to develop and implement a monitoring program to quantify mercury and PCB loads and loads reduced through source control, treatment and other management measures implemented by Permittees. A draft technical memorandum describing initial load reduction quantification methods for PCBs and mercury was submitted to the Water Board in the BASMAA FY 2009-10 Regional POCs and Monitoring Supplement. Written comments from Water Board and Permittee staff were received on the technical memorandum following the submittal.

Summary of Comments Received

Comments received from Water Board Staff (Richard Looker and Tom Mumley) and Permittees were generally supportive of the methods included in the draft memorandum. Comments focused on including additional methods for all control measures pertinent to provisions C.11/12 of the MRP, including mercury-containing devices, PCB-containing demolition materials, and on-site abatements. Additionally, Water Board staff requested that a new section be included in the memorandum to explain how the methods for each control measures work together to quantify load reductions. Permittees also requested that methods for PCBs and mercury included in the memorandum be revised to align better with similar methods currently under development for trash.

Anticipated Next Steps

In FY 2011-12, BASMAA member agencies plan to revise methods presented in the draft memorandum to address Water Board and Permittee staff comments. Anticipated revisions include adding methods for quantifying loads from all C.11/12 associated control measures and providing consistency with trash load reduction tracking methods. Additionally, information will be added to the memorandum to better describe the process by which Permittees use these methods to quantify loads reduced.

Discussions regarding revisions to these methods are planned in FY 2011-12 via the BASMAA Monitoring and Pollutant of Concern Committee (MPC). Revised methods are expected to be submitted with the FY 2011-12 Annual Report.